

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CYTIVA SWEDEN AB, and	)	
GLOBAL LIFE SCIENCES	)	
SOLUTIONS USA, LLC,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 18-1899-CFC-SRF
	)	
BIO-RAD LABORATORIES, INC.,	)	<b>CONSOLIDATED</b>
	)	
Defendant.	)	

**PLAINTIFFS' MOTION TO EXCLUDE EXPERT OPINIONS  
OF DR. BRUCE GALE**

Pursuant to Federal Rule of Evidence 702 and Federal Rule of Evidence 703, Plaintiffs Cytiva Sweden AB and Global Life Sciences Solutions USA LLC (collectively, "Plaintiffs") file this motion to exclude the expert opinions of Dr. Bruce Gale regarding (i) non-infringement based on the terms "fluidics section," "non-fluidics section," "and "panel member," incorporated in paragraphs 42-54; 58-67; 78-96; 100-115; 117-124; 126; 128-131; 159-180; 182; 184; 186; 189; 191-192; 194-196; 198-202; 204-205; 207-210; 215-217; 219; 221; 226; 228; 230; 232; 236-237; 241; 243; 256-258; 264-265; 267-269; 271-272; 279; 281; 283-285; 287-288; 290; 297; and 299 of his Rebuttal Expert Report; (ii) non-infringement based on the term "independently perform operations in response to instructions over a

BUS,” incorporated in paragraphs 134-141; 212-214; 223-224; 249-252; 256-258; 274-277; and 292-295 of his Rebuttal Expert Report; and (iii) the 2016 Experiments and modifying the 2040 system, including comparing it to the Accused System, incorporated in in his Opening Expert Report at paragraphs 299, 368, 444, 632, 652, 658, 663, 666, 669, 702, 731, 889, and Exhibits 4-8, and incorporated in his Reply Expert Report at paragraphs 36-52, and 57. The grounds for this Motion are set forth in Plaintiffs’ Opening Brief in Support of Motion to Exclude Expert Opinions and the supporting Declaration of Amy DeWitt and exhibits, filed concurrently.

NOW, THEREFORE, Plaintiffs respectfully request that the Court grant this Motion in the form of the Proposed Order attached as Exhibit A.

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